

TNO CODE



Why this TNO Code – and how to use it

The TNO Code serves as a guide for our daily conduct. We operate in a dynamic environment involving complex partnerships. There are no standard solutions: our work requires both professional and ethical judgement. This calls for a balance between clear guidance and the space for individual discretion.

The TNO Code provides a framework for making informed choices. It is a reference for situations where we must assess how we want -and are expected- to act. Yet true impact lies in the conversations we have about how to apply our values and norms in practice. The TNO Code is therefore constantly evolving, just like we are. We expect everyone to uphold TNO's values and norms. This also applies to external professionals and intermediaries acting on behalf of TNO. We ensure they are familiar with this code and commit to it.

The TNO Code also serves as a practical guide on the intranet. Each chapter links to relevant policies, procedures and tools. This helps us quickly access the right information to act responsibly and with sound justification.

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1

How we view society and our mission within it

TNO was founded to strengthen society through knowledge and innovation. To realise that ambition, we must have a clear understanding of how we view the world, and the mission we fulfil within it. This first chapter explains how our vision and mission provide us with direction.

In brief

- Our mandate, vision, mission and strategy guide who we are and what we do.

Our statutory mandate

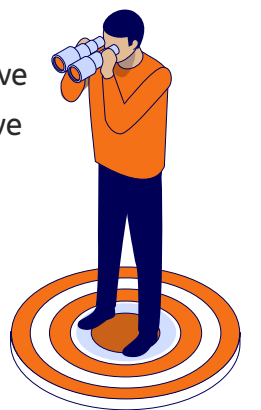
TNO was established by law (the TNO Act) to “contribute to the effective application of technical and natural sciences – and, where relevant, to link these with social sciences and other application-oriented research – in service of the public interest and its distinct sub-interests.”

On the basis of this legal mandate, we deliver knowledge and solutions that strengthen society.

Our vision

We recognise that innovation has brought us progress: a prosperous society and a competitive business sector. At the same time, we face major challenges such as climate change, an ageing population, increased security demands, continuing digitalisation, and the need for a more autonomous Europe. Prosperity must go hand in hand with the sustainable use of resources and the development of a healthy, inclusive society. We see that new technologies and scientific insights only have impact when they respond to real needs and are widely applicable.

Growing international competition calls for collaboration, strong R&D, and a focus on areas essential to the prosperity and wellbeing of our society.



Our mission

Our mission is “to create impactful innovations for the sustainable wellbeing and prosperity of society.” We do this through independent, applied research. We translate scientific insights and technological breakthroughs into practical applications, products and services, in collaboration with governments, businesses and knowledge institutions.

Thanks to our unique position – bringing together fundamental knowledge and hands-on expertise – we are able to develop and refine products, services and methodologies that are implemented in the market and society. In doing so, we contribute to the public good and to the earning capacity of the Netherlands.

Our strategy

In everything we do, we aim to make a meaningful contribution to society. Our goal is to generate tangible social and economic impact.

We do this on the basis of two core tasks: supporting the government in fulfilling (statutory) duties in the public interest; and strengthening the wellbeing and earning power of the Dutch society.

We increase our impact through close collaboration with governments, businesses, civil society organisations and knowledge institutions.

Through our roles in research, orchestration and innovation, we fulfil our unique position as a connecting force in the innovation process: from exploring promising applications and conducting research and development, to supporting the scaling up and implementation of innovation in businesses and society at large.



2

How our values and frameworks guide us

A shared mission and vision are important, but putting them into practice requires ongoing alignment and collaboration in our daily work. We operate in a demanding environment with many interests and opportunities. This makes it essential to make conscious, collective choices. Our core values and guiding frameworks help us navigate this complexity with clarity and confidence.

In brief

- Our core values guide our attitude and actions.
- Our internal frameworks enable meaningful collaboration across the organisation and our core practice.

Our core values: a compass for excellence and impactful innovation

At TNO, we work on innovations that matter. Our core values form the foundation of how we collaborate, make decisions and take responsibility. They guide how we bring our mission to life in practice. They become especially relevant when interests conflict or moral choices need to be made. And because values can sometimes be in tension with one another, we need to reflect carefully, weigh options, and have open conversations.

Our core values are not isolated concepts. Together, they form a compass for our conduct. They help us stay on course in a dynamic and complex environment. By applying them actively, we shape an organisation that excels not only in what we do, but more importantly in the impact we create together.

Pushing Boundaries

We push boundaries. We pursue innovative, visionary and practical solutions that contribute to a strong society and economy. This requires expertise, creativity, strategic thinking and an open outlook on the future.

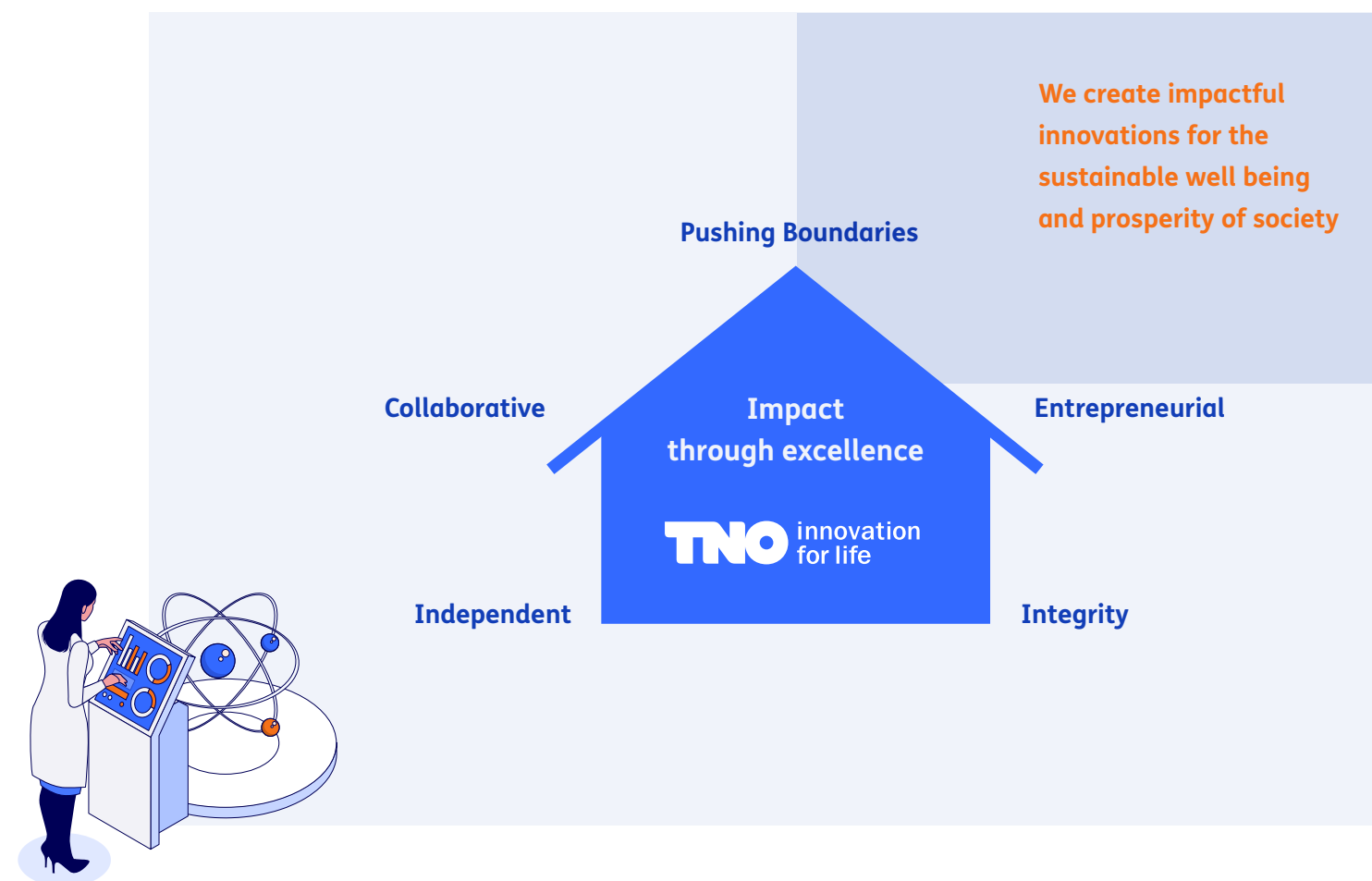
We challenge ourselves to look beyond conventional answers and deliver innovations that have real impact.

Entrepreneurial

We are entrepreneurial. We take initiative, show courage and work purposefully on solutions that deliver societal and economic value. We are agile, client- and result-oriented, and act with determination. This means we identify and seize opportunities, without being reckless.

Collaborative

We collaborate. Our impact is created through collaboration with clients and partners. We empathise, orchestrate innovation, and take the lead by connecting ideas and practice, bringing together perspectives and forming partnerships. Connection is also key within TNO: we build on each other's strengths, learn from one another and amplify our collective impact.



Integrity

We act with integrity. Integrity is the foundation of our credibility.

We operate in accordance with applicable moral values and norms.

This includes scientific integrity: we conduct our research honestly, diligently, transparently and responsibly.

Independence

We are independent in our role as an applied scientific research organisation. This position allows us to work in a solid and well-founded way, and to take full ownership of our work. We stay the course based on substance, without being swayed by undue pressure.

Values in context: staying on course in practice

Our core values help us stay on course in our daily work. We apply them as a whole, not in isolation. At times, values may conflict, or intersect with societal expectations, professional ethics or personal beliefs. This leads to the question: What is the right thing to do - for me, my team, for TNO, for society?

Such questions rarely have straightforward answers. They call for reflection, open dialogue and deliberate choices. TNO actively supports this process: by providing frameworks, space for dialogue, and a careful approach to concerns and reports. Chapter 9 explains how we do this, and how we keep the TNO Code alive in practice.

Which internal frameworks guide us

TNO's core lies in the practice of applied research. This is a meaningful and professional practice that reaches beyond our organisation. As an organisation, we aim to make this practice work as effectively as possible - by enabling collaboration, providing structure, and offering direction. This creates meaning on multiple levels:

- In the societal value we create (for society and business),
- In the practice of applied research itself (knowledge development),

- In the development of professional expertise (group and discipline),
- And in the personal growth of our people (individual).

To make this possible, we have established several guiding frameworks. These help align the dynamic nature of daily practice with the structure of the organisation. They support a shared TNO orientation and enable collaboration. Each unit or team makes its own choices, but always in line with these organisation-wide principles.

1. The TNO Act, mission, vision and strategy

Our mission and vision are based on the mandate defined in the TNO Act. Together with our strategy, they provide the primary framework for our substantive direction.

2. The TNO Code

The TNO Code defines the culture, mindset and behaviour we strive for. It acts as a moral compass in difficult decisions, and serves as a practical entry point to other frameworks and documents.

3. Organisational regulations

These outline the structure of TNO and define responsibilities and mandates, such as those of the Executive Board, the Supervisory Board, the Defence Research Council, the units and the Works Council. They also include the mandate structure and authority matrix.

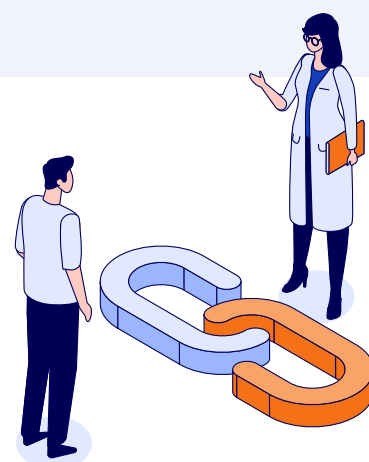
4. Management system

Our management system defines how we carry out our work. It describes the main outlines of our processes and refers to key procedures and supporting tools.

5. Policies (Policy House)

This includes internal policy documents on specific content areas, such as TNO's Security Policy, Publication Policy, or Ancillary Activities Policy.





3

Our stance
towards
society

TNO occupies a unique position as an independent knowledge organisation, working on innovations that support societal and economic progress. Our stance towards society, our clients and stakeholders must align with our mission, core values and statutory mandate. This chapter outlines how we, as an organisation, relate to social challenges and responsibilities.

In brief

- We have a societal mission and actively embrace it as a responsible corporate citizen.
- We comply with laws and regulations and act in line with the professional standards and societal expectations that suit our role.
- We communicate with care, honesty and transparency.

How we do this

We have a societal mission and aim for impact

Through research and innovation, TNO contributes to solving complex societal challenges, such as safety, health, sustainability and digitalisation. Our innovations are not only technologically advanced and ground-breaking, but also aimed at creating broad societal value. Our strategy is aligned with national and international agendas and objectives, such as the Sustainable Development Goals (UN), the Grand Societal Challenges, the EU's Key Enabling Technologies (EU), the Dutch National Technology Strategy and the Defense Strategy for Industry and Innovation (NL).

We are aware that technological progress brings both opportunities and risks. That's why we don't focus solely on positive impact, but also take into account potential negative consequences, such as environmental impact, resource use and human rights.

In doing so, we fulfil our responsibility as a corporate citizen: an organisation that is mindful of the broader impact of its activities on people, the environment and society.

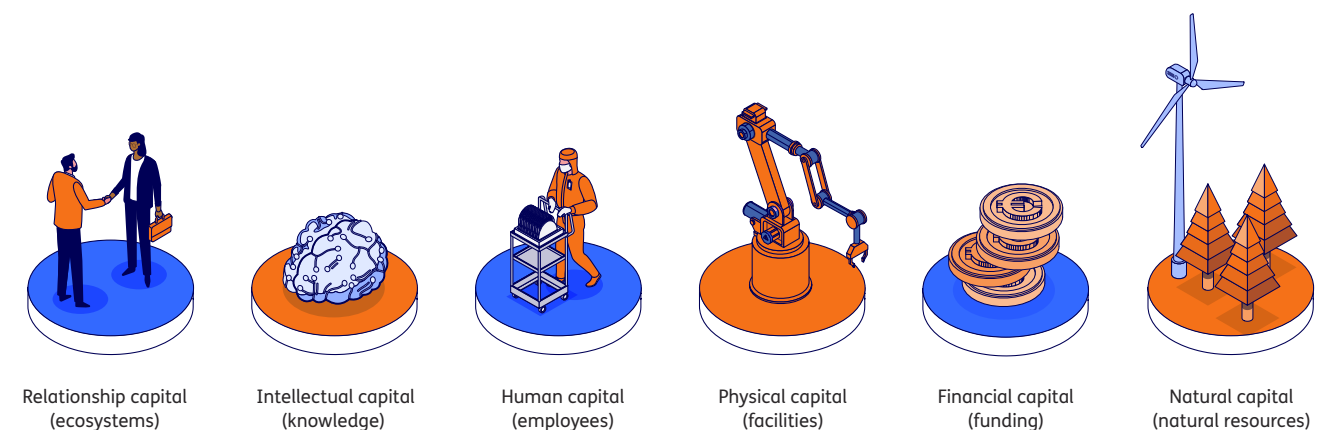
We assess societal dilemmas factually and independently

Our research often touches on societal and political debates. This can lead to complex considerations where different interests and perspectives collide. We base our decisions as much as possible on scientific knowledge, guided by our principles of independence and integrity. We ensure accountability for our choices by being transparent in our decision-making and fostering internal dialogue.

Where necessary, we take measures to mitigate risks, such as ethical reviews or contributions to standards and publications on the societal impact of our innovations.

We act with social responsibility

TNO plays an active role in the innovation ecosystem of the Netherlands and the EU, where we create both social and economic value. We do this by using various forms of capital in a responsible manner, recognising both the positive and negative impact of our activities, and taking responsibility for both. Our work is driven by six types of capital. The results of our research and innovations (output) have direct effects on our clients and partners (outcomes) and contribute, in the long term, to broad societal impact (TNO's impact).



In addition to our core process, we take responsibility in our operations. We consider the long-term effects of our decisions and translate external expectations regarding corporate social responsibility into actions at all levels of our organisation. We endorse the ten principles of the UN Global Compact, which relate to human rights, labour, environmental protection and anti-corruption. We also actively commit to themes such as working conditions, energy and sustainability, integrity and diversity, equity and inclusion.

We make conscious choices across our value chains

Our social responsibility extends beyond our own organisation. When selecting suppliers and partners, we consciously assess their commitment to sustainability, ethics and social impact. Although these parties are responsible for their own actions, we set clear expectations and make conscious, well-informed choices.

We respect human rights, legal obligations and societal norms

We strive to comply with all relevant (international) treaties, laws and regulations, both in letter and in spirit. We carefully weigh relevant norms and risks, and ensure we have the necessary expertise in-house, and that we apply it effectively. As an organisation, we support our employees by highlighting relevant frameworks and issues, and by enabling them to comply with applicable laws and treaties. In addition to formal legislation, we also take account of unwritten societal norms and shared ethical principles. This requires a collaborative mindset and a keen awareness of the broader context in which we operate.

We act and communicate factually, unbiased and independently

Our reputation as an independent research organisation is a cornerstone of our credibility. We therefore base our communications on facts, and ensure our work is traceable and objective.

We safeguard our independence and avoid activism or tunnel vision. As researchers, we prioritise curiosity and scientific evidence over personal preferences or external pressure.

Society must be able to trust that we communicate independently, even when the message is politically sensitive. If and when we take a position as an organisation, we do so within the scope of our societal role, knowledge and expertise, and we do so impartially and without political or ideological bias.

We coordinate media communications and public messaging carefully

Given our societal role, our communications may involve sensitive issues. They may also relate to sensitive knowledge or technologies that require communication restrictions, for example, due to national security, reputational risk to TNO or potential personal consequences.

That is why we coordinate media communications about potentially sensitive topics in advance with our manager and the Marketing & Communication department. This also applies to participation in public statements or joint press engagements with external parties.

We coordinate political engagement and policy advocacy activities with Public Affairs to ensure transparency and consistency in our interactions with policymakers and decision-makers. Employees or external parties representing TNO in this space do so in line with our values and norms, and must make their role clear and explicit.

We report contributions to political organisations and individuals

Any work carried out for political organisations, or responses to requests from politicians, is by definition sensitive. Substantive contributions to political organisations or individuals, whether in the Netherlands or abroad, are only permitted with explicit approval from the Executive Board. Employees who are politically active must report this as an ancillary activity via an HR Service Request.



4

How we shape good practice and role responsibility

Our shared mission at TNO is to realise impactful innovations. Innovation involves developing and/or implementing new ideas, methods, products or services that create value or improve existing solutions. We do this through a core practice of applied research, which we shape through a variety of roles.

In this chapter, we explain how we give shape to this professional practice, and which values and norms guide us in doing so.

In brief

- We actively develop our professional expertise and take responsibility in our roles.
- We apply our expertise in service of TNO's mission and core practice.
- Our work is rooted in a core practice of applied research.
- We endorse the Netherlands Code of Conduct for Research Integrity (NGWI).

How we do this**We work on developing expertise and role responsibility**

We strive to continually develop our professional expertise and to understand and fulfil the responsibilities that come with our roles. We act in line with the standards of our field and take initiative to strengthen our competences.

And apply this in service of TNO's mission and core practice

We use our professional skills to contribute to TNO's mission and practice. Whether we are researchers, business developers, support staff or managers, we each contribute to the core practice of applied research in order to help realise our mission.



We strive for quality and integrity, in both content and our approach

Quality is the foundation of our work and reputation. We ensure both the substantive quality of our innovations and the way we deliver them. In every role, we carry the responsibility of sound research. We adhere to the principles and standards set out in the Netherlands Code of Conduct for Research Integrity (NGWI), which emphasises honesty, scrupulousness, transparency, independence and responsibility.

We actively prevent breaches of research integrity, particularly fabrication, falsification and plagiarism

Behaviour that contradicts the core values of science constitutes a breach of research integrity. At a minimum, this includes fabrication, falsification or plagiarism. We take active measures to prevent such breaches and report any suspected violations without delay.

We safeguard independence in our research

Independence is critical to the credibility of our work. We remain alert to potential conflicts of interest and ensure our conclusions and publications are free from undue influence.

We treat research participants and their data with care

In research involving human participants, we ensure participation is voluntary and based on informed consent. When working with personal data or other human-related information, we apply appropriate safeguards and implement technical and organisational measures to minimise data processing, such as pseudonymisation. Where necessary, such research is subject to prior ethical review.

We minimise and refine the use of animals in research

Animal research is only conducted when no suitable alternatives are available, and when the societal benefit outweighs the burden on the animals. We aim to minimise the use of animals and actively develop alternatives to animal testing.

We handle genetic resources fairly and responsibly

When working with genetic resources, we follow the Nagoya Protocol. This means we obtain prior consent and agree on fair and equitable benefit-sharing arrangements.

We use artificial intelligence (AI) in a responsible and innovative way

AI offers valuable opportunities for our research. We embrace these opportunities by actively contributing to the development of responsible AI and by applying the technology carefully in our own work.

We only use approved AI systems and follow internal guidelines for the use of generative AI. We are aware of both the potential and the limitations of AI, and we make considered choices about how and when we use it.



5

How we collaborate and interact with one another

At TNO, we believe that collaboration is key to creating impact. Every role within our organisation is essential, but it is through collaboration that we truly make a difference. This chapter outlines how we aim to engage with one another.

In brief

- We collaborate with a “One TNO” mindset.
- We act in line with the principles of responsible employer and employee conduct.
- We treat each other with respect.
- We recognize, acknowledge and value our differences.
- We take care of each other’s wellbeing.

**How we do this****We collaborate with a “one TNO” mindset**

Shared results take precedence over individual interests. We challenge one another to deliver results and inspire collaboration towards impactful innovations. We follow the shared TNO direction. When we encounter uncertainty, resistance or perceived unfairness, we speak up and seek clarity. We share relevant information in a timely manner and support colleagues when needed.

We act in line with the principles of responsible employer and employee conduct

TNO strives to be a good employer by offering a safe work environment, supporting individual development and providing fair employment conditions. As employees, we are familiar with relevant laws, TNO policies and internal HR regulations, and we hold one another accountable in complying with them. We carry out our work with professional judgement and aim for a healthy work-life balance.

We treat each other with respect

Integrity starts with respect for one another. We speak well of one another, both inside and outside TNO, and avoid behaviour that compromises personal integrity, such as aggression, violence, sexual harassment¹ or bullying². We create a pleasant working environment together. This means addressing inappropriate behaviour and adjusting our own behaviour where needed. This environment also includes interns, trainees, PhD candidates, secondees and guests.

We recognise, acknowledge and value our differences

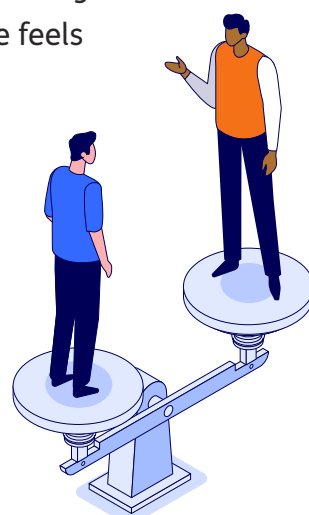
We aim to foster a diverse, inclusive and equitable organisation where everyone can develop to their full potential, and where there is no room for discrimination or racism. We recognise and appreciate differences in perspectives, backgrounds and approaches, and see these as an enrichment to our organisation. To us, inclusion means that everyone can contribute fully, regardless of individual characteristics or background. We use English as the working language in multilingual settings, and in external collaborations we respect the local culture, within the framework of the TNO Code.

We take care of each other's wellbeing

A safe working environment is essential, both physically, socially and psychologically. We identify and report safety risks and follow all safety protocols. We also foster a professional culture that encourages curiosity, open communication and a respectful interest in one another's motivations. We respect each other's dignity and interests, including in one another's absence, and we create a space where everyone feels safe to express ideas, concerns or mistakes.

1) Sexual harassment includes any form of verbal, non-verbal or physical conduct of a sexual nature (e.g. unwanted physical contact, sexually suggestive comments, emails, text messages or inappropriate staring) that has the purpose or effect of violating a person's dignity, particularly where it creates an intimidating, hostile, offensive, humiliating or hurtful situation. (Article 1a(3) of the Dutch Equal Treatment Act; Article 7:646(8) of the Dutch Civil Code)

2) Bullying refers to repeated and systematic degrading, intimidating or hostile behaviour directed at a person (or group) who is unable to effectively defend themselves. Common forms include social exclusion, making tasks unpleasant or impossible, personal attacks, gossip, insults or ridicule.



How we maintain a healthy and professional balance between work and private life

Working at TNO also brings responsibilities beyond working hours. Behaviour in our private lives can affect our work environment. This chapter provides guidance on how to maintain a healthy balance between personal and professional conduct.

In brief

- We take care of our health and vitality.
- We avoid behaviours outside working hours that could negatively affect TNO or our work.

How we do this

We take care of our health and vitality

Vitality is important for our job satisfaction, performance and the way we function as a team. We take personal responsibility, remain alert to warning signs, and seek support when needed. We also look out for one another and speak up if we are concerned about a colleague. TNO provides support and space to help us work in a healthy and resilient way. If we are going through a rough patch, we make room for recovery.

We handle alcohol responsibly

The use of alcohol or recreational drugs is not permitted during regular working hours or when it may affect work performance or professional conduct. During specific occasions, such as internal or external TNO-related events or activities, we use alcohol responsibly.

We safeguard our reputation, even in private situations

Outside the workplace, we remain mindful of our role as TNO employees. We avoid behaviour that could harm the reputation or interests of our employer. This includes communication: we ensure that our personal opinions cannot be mistaken for official TNO statements, and we refrain from making

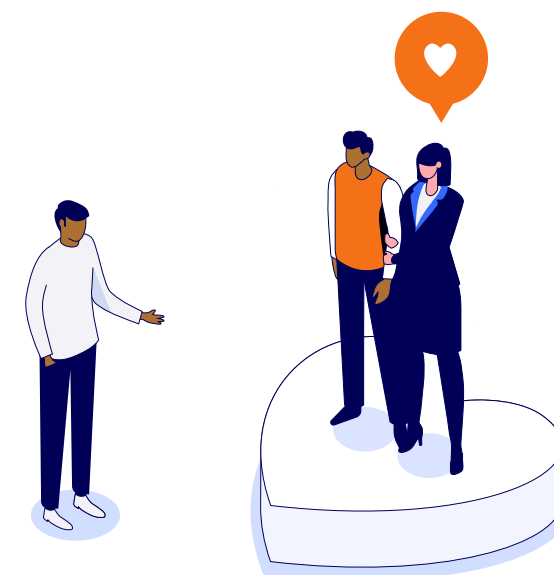
comments that may affect our credibility as a reliable research organisation. We are also mindful of the sensitivity of the knowledge and technologies we work with.

We avoid conflicting ancillary activities

Ancillary activities can be enriching, but they must not conflict with our work at TNO. Therefore, we request prior written approval for such activities, in accordance with the ancillary activities policy. Income derived from such activities that are directly related to our work at TNO will, in principle, be allocated to TNO.

We consider the implications of intimate relationships at work

Intimate relationships can arise anywhere, including in the workplace. If we enter into an intimate relationship with a colleague, we remain aware of how this may affect our surroundings. We avoid any (perception of) conflict of interest and ensure that the relationship does not have a negative impact on the team or the organisation. Relationships between colleagues in a hierarchical relationship are problematic and must be reported to the manager, so that appropriate measures can be taken.



7

How we engage with external partners and business relations

Our external relationships are essential to our success. To push boundaries and be impactful, we must collaborate with an entrepreneurial mindset, always grounded in integrity and independence.

In brief

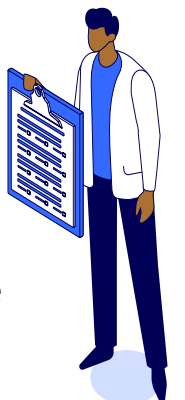
- We collaborate with our business relations with an entrepreneurial spirit, pushing boundaries with integrity
- We carefully weigh competing interests and avoid conflicts of interest.
- We are alert to potential risks in our partnerships or partners.
- We do not tolerate bribery or corruption.

How we do this**We collaborate with an entrepreneurial spirit, pushing boundaries with integrity**

We actively seek innovative solutions for our clients and think creatively about what is possible, even beyond conventional paths. We aim to understand their goals and expectations so we can deliver real value. At the same time, we safeguard our scientific integrity and professional objectivity, consistent with our role and reputation as an independent research organisation. In our partnerships, the public interest comes first, with due regard for TNO's interests. Our clients and partners can count on a driven and agile collaboration, grounded in integrity.

We follow the competition guidelines set by the Ministry of Economic Affairs (EZ)

Together with the TO2 Federation, – the alliance of five Dutch applied research organisations (Deltares, MARIN, NLR, TNO and WUR) – the Ministry of Economic Affairs (EZ) has developed guidelines that define where the role of publicly funded institutes ends and that of the market begins. To avoid unwanted competition with market players,



we adhere to the agreements TNO has made with the Ministry regarding publicly funded research, contract research, facility rentals, intellectual property, spin-offs and spin-outs, and the prevention and handling of complaints.

We carefully assess who we partner with, and for what

We work with trusted partners. This means we make sure we know who we’re working with. Our standards are based on relevant laws and regulations as well as broadly accepted standards of reliability and integrity in both industry and government. We comply with laws on sanctions and export controls and knowledge security. We also assess the nature of the collaboration, including factors such as sensitive or classified information, sensitive technologies and the risk of unlawful state aid.

We are also aware of the role our partners and suppliers play in the digital supply chain. That’s why we consider cybersecurity, secure data exchange and the responsible use of AI when deciding whether and how to collaborate.

We avoid (the appearance of) conflicts of interest

Conflicts of interest arise when someone serves multiple interests that may influence each other, compromising their integrity. In our work, where different interests converge, we stay alert to both organisational and personal conflicts of interest.

Organisational conflicts may occur between client interests and the different roles we perform at TNO. We always prioritise the public interest, and ensure it is upheld through our mission, core values and scientific integrity. Our reports clearly state the context in which conclusions and recommendations were developed, allowing external parties to assess possible conflicting interests. We avoid offering advice that could compromise our independent reputation and do not allow undue influence at any stage of our research.

We prevent personal conflicts of interest by keeping personal interests strictly separate from those of TNO, its partners or its clients. We do not award contracts to or through organisations or individuals with whom we have close personal ties. If a (potential) conflict of interest arises, we report it immediately to our manager, who will take appropriate action in consultation with unit management or the Executive Board.

We do not engage in insider trading

In the course of our work, we may gain access to confidential, non-public information that could influence a company’s share price if disclosed (price-sensitive information). Trading on the basis of such insider information is prohibited by law. We never use this type of information for personal gain or for the benefit of others.

We maintain a firm stance against bribery and corruption

We do not accept, promise, offer or request money, gifts or other benefits intended to improperly influence our own actions or those of others. We also avoid any appearance of improper influence, conflicts of interest or compromised independence. We comply with all applicable laws and do not accept or offer payments, gifts or favours that would violate these, including indirect forms such as quid pro quo arrangements or delayed decisions in exchange for benefits.

We are prudent with gifts, services and invitations

Small gestures, such as offering or accepting gifts or invitations, help maintain professional relationships and are part of business life. However, we take measures to safeguard our independence. We may offer or accept gifts (up to a value of EUR 50) if appropriate to the occasion and if they do not influence our actions, or those of others. We do not accept larger gifts or favours, as they may give rise to undue influence or create unwanted expectations. Any payments or favours for work related to our role may only be accepted if explicitly agreed upon with TNO.



We take a professional approach to business invitations

Invitations from external relations are assessed from a professional perspective. We consider the purpose of the event, the nature of the relationship, and whether any sense of obligation or reciprocity might arise. We are transparent about such invitations and discuss them with our manager. If the event is clearly relevant to TNO, but attending at the organiser's expense could raise questions about the employee's independence, TNO covers the cost of participation.

We handle affiliated companies with care

We collaborate with spin-offs and other affiliated entities when this aligns with our public mission. In doing so, we assess each situation in light of state aid regulations. Any such collaboration is transparent, market-based, and conducted with sufficient separation to avoid unfair advantages.

We adhere to the rules for legal representation

Responsibilities within our organisation are clearly defined. For this reason, we have a mandate structure. From a legal standpoint, we may only represent TNO if we are authorised to do so under this mandate.

We maintain proper records and handle resources responsibly

We are diligent, reliable and transparent in how we record, document and report. All financial transactions are registered, we do not use off-the-record accounts. We use the resources entrusted to us efficiently and purposefully, in line with professional standards and the agreements we have with our stakeholders. If we wish to deviate from those agreements, we inform the funding party in advance.



How we manage assets and resources

We achieve our mission using the resources and facilities provided by TNO. Responsible use of property, funds and information is essential to this effort.

In brief

- We manage TNO property and (financial) resources with care.
- We prevent fraud and protect our data.
- Use of resources must serve the interests of TNO.

How we do this

We protect (intellectual) property rights

Our knowledge is a vital asset and may be valuable for innovation. That is why we safeguard our knowledge and intellectual property rights with care. This also means we treat the property of others, including goods, materials and information entrusted to us, with respect.

We handle TNO property and materials responsibly

We recognise our responsibility to handle TNO’s knowledge and property with care. Limited personal use of company resources is permitted, but only with prior approval or according to agreed procedures. We do not leave TNO property or data unattended and take precautions to prevent theft or loss. We report any loss or theft of valuable materials or sensitive data immediately to our manager and the Local Security Officer; and to the IT Service Desk in the case of IT assets.

We ensure the safety of people, property, knowledge and information

TNO’s Corporate Security department develops policies to protect people (and their data), property, knowledge and information. We take threats seriously and comply with relevant legislation, the TNO Security Policy, and all related

regulations, instructions and procedures. We report security incidents immediately to the Local Security Officer. Where possible, we take direct action to prevent or minimise damage.

We do not commit fraud

We always provide accurate information and avoid any misleading representation for personal, financial or other gain.

We record our working hours honestly

Many of our clients require a transparent record of hours worked. We log our hours truthfully, allowing both internal and external accountability, and enabling learning and improvement. We never shift hours between projects. We act transparently, raise any shortfalls in good time with management, and ensure colleagues can discuss such issues with clients early on.

We are modest in representation, travel and other business-related expenses

Simplicity is a virtue. Our representation and other business-related expenses are always justified and proportionate. For business trips, we ensure participants have a clear professional interest for attending and weigh up the sustainability impact of the travel.

We treat confidential and classified information with care

We never use information obtained directly or indirectly through our work for personal purposes. We understand that TNO-related information may be confidential and handle it accordingly (open where possible, protected where necessary). Employees who access or process sensitive information do so in accordance with the TNO Security Policy.



9

How we keep the TNO Code alive in practice

The strength of the TNO Code lies in its application. Integrity is a shared responsibility that requires learning, reflection, action and adjustment. This chapter explains how we, at TNO, work together to keep the TNO Code alive and ensure that it remains meaningful in our daily practice.

In short, we focus on three pillars:

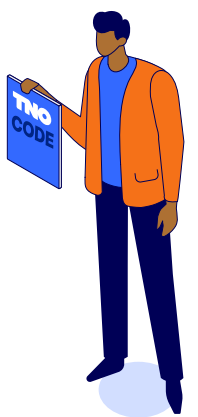
1. We ensure that foundational knowledge is in place.
2. We promote reflection, dialogue and practical wisdom.
3. We handle reports and incidents with care.

When these pillars function well, they help build a learning organisation and promote the development of practical wisdom regarding our attitude and actions (“moresprudence”). This enables us to act with awareness of our position and influence, and to be accountable as both individuals and as an organisation.

We ensure foundational knowledge is in place

The TNO Code serves as the foundation for organisational conduct and policy-making. Everyone at TNO should understand the values and frameworks that apply and know where to find them. What we do:

- New employees learn about professional integrity during their onboarding programme.
- Upon employment, employees sign the TNO Code and - where applicable - confidentiality agreements.
- The TNO Code is part of the TNO Policy House and is digitally available in Dutch and English.
- Teams and their managers are responsible for discussing themes from the TNO Code, with support available if needed.
- Ethics, integrity, and related dilemmas are discussed in training and feedback conversations when appropriate.



- We maintain ongoing conversations through e-learnings, sessions, interventions and communication.

We promote reflection, dialogue and practical wisdom

We are a learning organisation. We foster an environment where questions, doubts and moral dilemmas can be openly discussed. In doing so, we collectively develop practical wisdom.

Encouraging open dialogue about dilemmas

Everyone encounters dilemmas from time to time. We encourage open discussion, and managers play an active role in facilitating these conversations. If raising a dilemma feels difficult, support is available from one of our confidential counsellors.

Some helpful questions include:

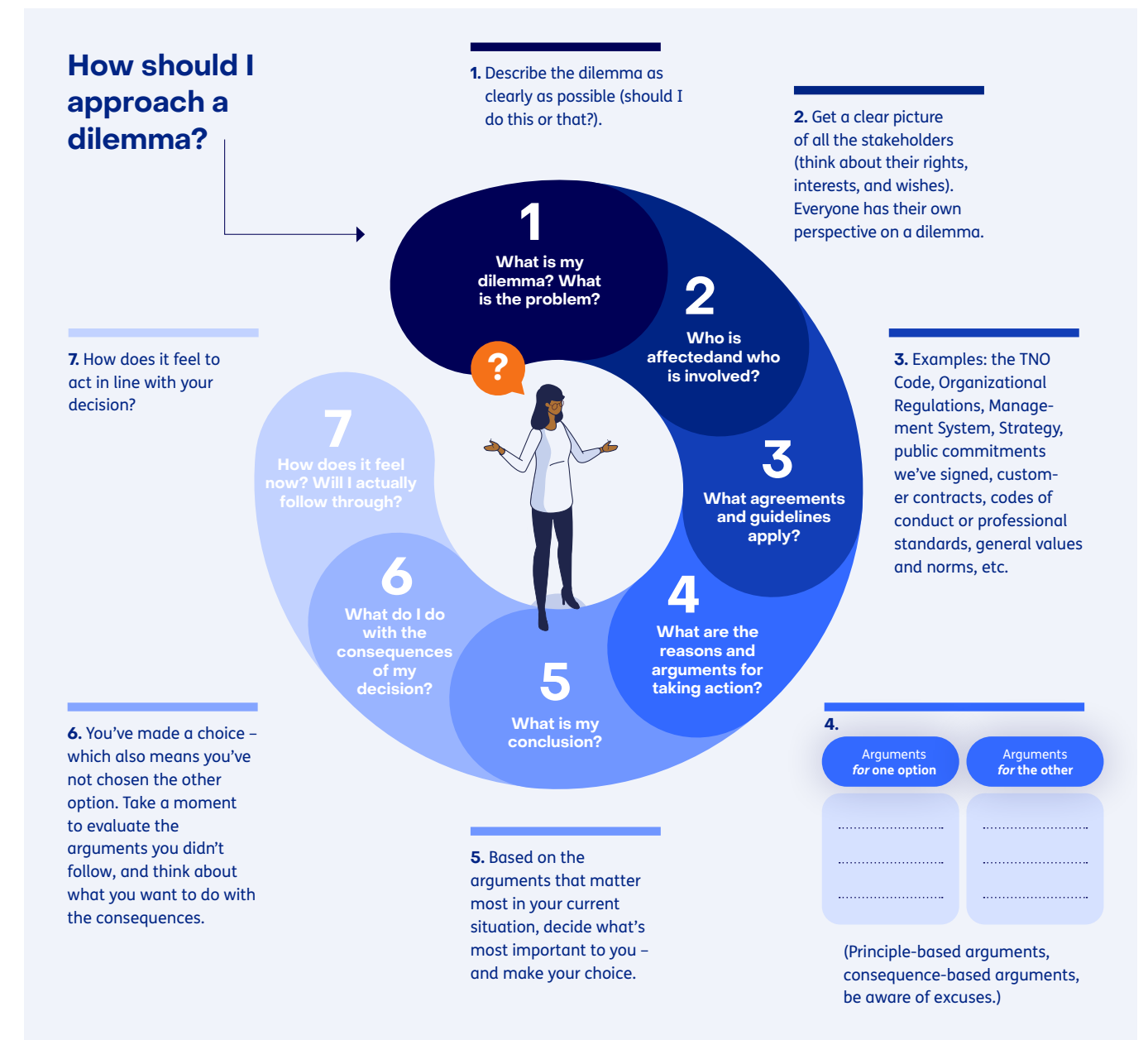
- Do I have enough information to base my decision on?
- Can I look myself in the mirror after making this choice?
- Would I be comfortable if a colleague behaved similarly?
- Could I explain this decision to a journalist or internal colleague?
- Did I involve others in my considerations?
- Does my choice strengthen trust in me and in TNO?
- Does this choice have a positive long-term impact?

Some dilemmas require deeper insight. The step-by-step plan provided can help weigh arguments and analyse the dilemma.

What we expect from employees

We share responsibility in promoting TNO's integrity. This means:

- We know the TNO Code and act accordingly.
We contribute to an open and constructive learning culture.
- We reflect on ourselves and the organisation.
We proactively discuss doubts and ambiguities and seek solutions.
- We use the available channels for questions or concerns.



What we expect from leaders

Leaders play a vital role in promoting integrity within our organisation.

The 'Guiding Principles for TNO Leadership' consist of six pillars: to inspire, to provide direction, to connect, to adapt to change, to show and demonstrate values and norms, and to let employees flourish. The TNO Code provides direction for our attitude and actions, and helps employees navigate and access the applicable frameworks that govern our work.

Managers lead by example and are alert to signals that something may be wrong. We expect them to:

1. Exemplify TNO values and norms.
2. Recognise and acknowledge good behaviour.
3. Foster a safe and integrity-driven working environment that encourages openness and dialogue around questions and dilemmas.
4. Recognise signs of resistance or unrest and respond in a timely and appropriate manner.
5. Address behaviour inconsistent with the TNO Code and scientific integrity obligations from the NGWI.
6. Respond to incidents in line with TNO's 'Regulations governing the suspicion of wrongdoing', supported by HR Business Partners, the Ethics & Integrity Officer, and the Central Confidential Counsellor.

We handle reports and incidents with care

You can raise a question, dilemma or incident in different ways depending on the situation, severity and your own judgement. Sometimes a conversation is enough; other times a formal report is necessary. Most importantly, you are not alone.

The visual below outlines how we approach this – from self-reflection to formal external reporting. Broadly speaking, we distinguish three routes:

- Informal: start with personal reflection and dialogue.
- Formal internal: when informal solutions are insufficient.
- External: if internal resolution is (no longer) suitable.

Informal: start with personal reflection and dialogue

It often begins with asking yourself: Does this align with our values and norms? Is it a dilemma or an incident? Can you talk to a colleague, your manager or a confidential counsellor? Can specialists help clarify? Many situations can be addressed relationally without becoming formal complaints. Support roles in this phase include:



Colleagues

For most questions and dilemmas, colleagues are the first people to talk to.

Direct or 'next-higher' manager

The manager is usually the first point of contact within teams. If the issue or dilemma involves the direct manager, their manager (the 'next-higher' manager) is the logical next point of contact.

Local or central confidential counsellor

For questions or concerns about professional or scientific integrity, conduct, or matters of conscience, you can turn to a local or external confidential counsellor. They offer a listening ear and serve as a sounding board, supporting reflection and advising on possible next steps within TNO. The Central Confidential Counsellor coordinates the (local) confidential counsellors and serves as the confidential counsellor for TNO's first, second, and third management echelons.

HR Business Partner

The HR Business Partner supports managers in their personnel responsibilities and is typically the first sparring partner for issues.

Ethics & Integrity Officer

The Ethics & Integrity Officer advises the organisation and its management on ethics and integrity and ensures implementation and safeguarding of the TNO Code and other integrity policies. The Ethics & Integrity Officer also serves as secretary to the Integrity Advisory Board and the Integrity Reporting Center.

Content experts

TNO also has various staff specialists who support employees on specific questions or dilemmas, for example in the areas of Security, Privacy, Diversity, Equity & Inclusion, Corporate Social Responsibility, Sanctions and Export Control, and Compliance. Ethical review committees are available for research involving humans or animals.

Formal internal: when informal routes are insufficient

Some situations require formal review, judgement, or protection. TNO provides several formal routes to ensure serious matters are handled carefully, safely, and fairly:

Integrity Reporting Center

(Regulations governing the suspicion of wrongdoing TNO and NGWI)

For (anonymous) reports of suspected social, professional, or scientific

misconduct. The Integrity Reporting Center reviews the report and issues a position statement. The IRC is chaired by an independent external expert.

- By email/phone via the Ethics & Integrity Officer (secretary to the IRC): meldpuntintegriteit@tno.nl
- (anonymously) via a confidential counsellor

Central Complaints and Advisory Committee (CKAC)

(Individual complaints procedure)

For complaints about personal harm by (someone within) TNO: violations of terms of employment, codes of conduct, or standards of behaviour.

- By email/phone via the secretary to the CKAC: ckac@tno.nl
- (anonymously) via a confidential counsellor

Corporate Legal (External Complaints Procedure)

For complaints from third parties about the behaviour of TNO or its employees. Submit in writing to the Corporate Legal department.

In addition, Labour Affairs provides legal support to HR Business Partners in complex cases, and a review committee is available for employees during reorganisations.

External: if internal handling is no longer suitable

In some cases, you may choose to contact an external body, such as:

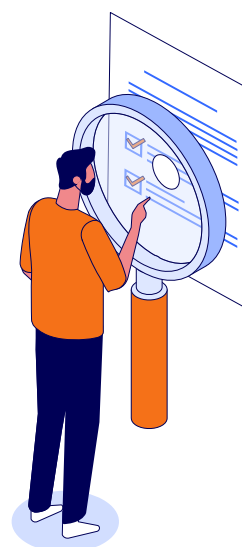
- The Dutch Whistleblowers Authority (for public-interest misconduct)
- Other external authorities such as disciplinary boards or regulators, depending on the nature of the case

Although we prefer to resolve issues internally, we fully respect every individual's right to escalate externally.

Our guiding principles in dealing with incidents

When responding to incidents or reports, we follow these principles:

- Take every report or incident seriously.
- De-escalate where possible, but don't discourage.
- Keep matters contained, but escalate in time.
- There are more options than you think.



- Speak up, and be open to feedback.
- Aim for equal treatment in comparable situations.

Consequences of non-compliance

Although we are a learning organisation, serious or repeated breaches of the standards set out in the TNO Code may lead to disciplinary measures. These are handled carefully and proportionately, in consultation with HR Business Partners and HR Labour Affairs. Measures may include formal warnings, suspension or – in extreme cases – termination of employment.

Review and development of the TNO Code

We review the relevance and application of the TNO Code annually. Inputs include:

- Practical experience (questions, dilemmas and reports)
- Changes in policies, laws and regulations
- Input from employees and managers
- The Integrity Advisory Board (the IAB advises the Executive Board on the integrity policy, including this code, and on activities aimed at strengthening awareness and integrity in the conduct of TNO employees and leadership, both within and on behalf of the organisation.)

If changes are required, they are submitted to the Executive Board. The Works Council holds the right of consent regarding the TNO Code. Reviews may also lead to updates in related policy, training or communication.

Do you have suggestions to improve the TNO Code or its implementation? Contact your manager or the Ethics & Integrity Officer (ethics@tno.nl). Together, we keep the TNO Code alive – in how we work, decide, speak up, and support one another.



This TNO Code is effective as of 1 September 2025 and replaces the TNO Code dated 15 May 2019.

